



Idaho National Laboratory Action Plan

**Commitment 23, Work Planning and Control
DNSFB Recommendation 2004-1**

Executive Summary

Evaluation Process

On December 2, 2005, DOE Idaho Operations Office (DOE-ID) directed Battelle Energy Alliance, LLC (BEA) to perform a self-assessment of work planning and control to meet Commitment 23 of the DOE Implementation Plan for Defense Nuclear Facilities Safety Board Recommendation 2004-1. The assessment was performed by a team of BEA managers and subject matter experts, using a Criteria Review and Approach Document (CRAD) supplied by DOE-ID, to determine the adequacy and effectiveness of work planning and control at the Idaho National Laboratory (INL).

The assessment was performed by completing three activities:

- Comparing INL program and process documentation to the criteria listed in the CRADs,
- Evaluating program and process implementation by reviewing the results of internal and external assessments performed since February 1, 2005 (the date of formation of the INL and initiation of the BEA contract), and
- Evaluating performance by reviewing previous assessment reports and performance measurement and analysis reports.

To the extent possible, the assessment included a comparison of the criteria used in the previous assessments to the criteria listed in the DOE CRADs. In some cases, the discussion and results of the assessments were used as evidence that criteria were addressed even if the criteria were not formally specified. Some additional review was performed in cases where specific DOE criteria did not appear to have been addressed.

Overall Evaluation Summary

The assessment concluded that the criteria of the performance objectives identified in the DOE Work Planning and Control CRAD were adequately addressed by the INL program and process documentation. The internal and external assessments reviewed during this evaluation concluded that the program and processes were effectively implemented with the exception of work planning and control oversight which needed improvement. The evaluation ratings were the following:

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Work Planning and Control		
Performance Objective		Evaluation
WPC-3	Work Planning and Control Program Documentation	Fully Met
WPC-4	Work Activity Definition and Hazard Identification	Fully Met
WPC-5	Work Control Documents	Fully Met
WPC-6	Work Performance	Fully Met
WPC-7	Work Planning and Control Oversight	Partially Met

The assessment identified nine opportunities for improvement (OFIs). Four of the OFIs involved corrective actions for findings identified by the DOE Office of Independent Oversight and Performance Assurance (DOE-OA) assessment performed during FY 2005. Three of the OFIs involved corrective actions for reported noncompliances of Price-Anderson Amendment Act (PAAA) requirements.

The assessment format provided by DOE-ID included an identification of noteworthy practices for each objective. These noteworthy practices were described as those processes and procedures which are worthy of sharing with other sites looking to improve existing processes. Such practices were not identified in the assessment results for two reasons:

- Many of the current INL processes are being consolidated and transformed to more effectively address the needs of the new laboratory, and
- Identifying noteworthy practices requires knowledge of the activities and practices of other sites which INL does not fully possess.

However, INL is willing to share any current or future processes and procedures which may benefit other sites in improving performance.

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Performance Objective WPC-3: Work Planning and Control Program Documentation

Opportunity for Improvement #1

The activity-level work planning and control processes need to be consolidated/transformed to improve risk management and process efficiency and to better meet the needs of the new laboratory focus on research and development.

Action	Deliverable(s)	Due Date	Owner / Organization
Revise work planning and control program and process documentation.	Approved documents	8/1/2006	V. M. Bowen / Facilities and Site Services
Implement revised work planning and control program and processes.	Implementation statements from affected organizations	9/30/2006	

Opportunity for Improvement #2

Human behaviors and performance need improvement to reduce work related injuries and illnesses and to enhance safe work accomplishment.

Action	Deliverable(s)	Due Date	Owner / Organization
Provide integrated behavior based safety/human performance training.	Training rosters showing completion of training	9/30/2006	C. A. Johnson / Infrastructure, Optimization, Integration, and Planning
Implement integrated behavior based safety/human performance processes.	Implementation documents	12/15/2006	

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Performance Objective WPC-4: Work Activity Definition and Hazard Identification

Opportunity for Improvement #1

Analysis of potential radiological hazards associated with non-uniform radiation fields and glovebox failures has not been sufficiently rigorous to ensure that these hazards are adequately controlled. (DOE-OA Assessment, June 2005)

Action	Deliverable	Due Date	Owner / Organization
Complete 15 actions in CATS INEEL-08/19/2005-0001-1	Closure documentation identified in CATS	5/31/2006	C. D. Morgan/ RTC Radiological Controls

Opportunity for Improvement #2

ATR does not have a process for identifying controls for non-radiological hazards for RCTs entering spaces to perform surveys. (DOE-OA Assessment, June 2005)

Action	Deliverable	Due Date	Owner / Organization
Complete 4 actions in CATS INEEL-08/19/2005-0002-1	Closure documentation identified in CATS	10/31/2006	M. B. McDonough/ ATR Operations

Opportunity for Improvement #3

ATR has not established appropriate controls to ensure that all workers are promptly notified of fire alarms in areas where the alarms cannot be heard. (DOE-OA Assessment, June 2005)

Action	Deliverable	Due Date	Owner / Organization
Complete 3 actions in CATS INEEL-08/19/2005-0003-1	Closure documentation identified in CATS	7/07/2006	M. B. McDonough/ ATR Operations

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Opportunity for Improvement #4

INL has not ensured that clear and unambiguous requirements for confined spaces are consistently applied at ATR to minimize the risk to workers, consistent with the intent of OSHA regulations. (DOE-OA Assessment, June 2005)

Action	Deliverable	Due Date	Owner / Organization
Complete 9 actions in CATS INEEL-08/19/2005-0004-I	Closure documentation identified in CATS	8/30/2006	P. L. Hapke / Nuclear Operations ES&H

Opportunity for Improvement #5

Programmatic failure of work planning and hazard control for a radiological evolution at MFC caused unplanned personnel exposures. (INL Internal Assessment).

Action	Deliverable	Due Date	Owner / Organization
Complete 26 actions in NTS-ID-BEA-FMF-2005-0002	Closure documentation identified in NTS	1/30/2006	R. R. Chase / Nuclear Operations Labs and Hot Cells

Performance Objective WPC-5: Work Control Documents

Opportunity for Improvement

Administrative errors identified during the close-out process for maintenance work orders at ATR indicate that the previous corrective actions developed to resolve the errors were not fully effective. (INL Internal Assessment)

Action	Deliverable	Due Date	Owner / Organization
Complete actions in NTS-ID-BEA-ATR-2005-0002	Closure documentation identified in NTS	8/31/2006	J. E. Dwyer/ ATR Operations

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Performance Objective WPC-6: Work Performance

Opportunity for Improvement

The MFC Nuclear Facility Training and Qualification Program had not adequately implemented. (INL Internal Assessment)

Action	Deliverable	Due Date	Owner / Organization
Complete actions in NTS-ID-BEA-MFC-2005-0001	Closure documentation identified in NTS	6/28/2007	R. R. Chase / Nuclear Operations Labs and Hot Cells

Performance Objective WPC-7: Work Planning and Control Oversight

Two opportunities for improvement relating to WPC-7 are documented in the INL Action Plan for Commitment 25: Feedback and Improvement, F&I-2.